

[Counsel Listed on Signature Page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

**STIPULATION REGARDING UBER
INTERNAL COMPANY DOCUMENTS**

This Document Relates to:

ALL ACTIONS

Judge: Hon. Lisa J. Cisneros
Courtroom: G – 15th Floor

As required by ECF 2647, Plaintiffs and Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, “Defendants” or “Uber”) (jointly, “the Parties”) respectfully stipulate as follows:

Plaintiffs’ counsel acknowledge and agree that they, including Plaintiffs’ counsel’s staff, experts, consultants, and any other persons or entities working on Plaintiffs’ behalf or at Plaintiffs’ direction, including Plaintiffs’ counsel’s clients (collectively, “Plaintiffs”), are not authorized to access any data, computer, computer system, or computer network maintained by or on behalf of Defendants, or any data, computer, computer system, or computer network of Defendants’ agents or counsel.

The Parties agree that, while entitled to review the documents Defendants have produced, Plaintiffs are not authorized or entitled to directly access documents or information accessible via hyperlinks or URLs contained within Defendants’ produced documents, unless those linked documents are publicly available (*i.e.*, documents and information that Plaintiffs could have located independently through a public search, without using the link or URL from the document Defendants produced).

1 The Parties therefore agree that Plaintiffs' counsel and everyone working with Plaintiffs or on
2 Plaintiffs' behalf who has access to documents or information Defendants have produced will make
3 reasonable efforts (including, *e.g.*, by reviewing the context of the document containing the hyperlink,
4 by reviewing the URL of the hyperlink, etc.) to avoid accessing or requesting access to internal Uber
5 company documents or information, as well as to other non-public documents and non-public
6 information accessible via hyperlinks or URLs contained within a document Defendants have
7 produced in this litigation. This required diligence extends to hyperlinks or URLs that include, *e.g.*,
8 "uber," "docs.google.com," "drive.google.com," etc., or that otherwise appear to lead to internal Uber
9 company documents or non-public documents or non-public information.

10 Plaintiffs acknowledge that they understand that if a hyperlink within an Uber-produced
11 document is clicked or a URL from an Uber-produced document is copied into a web browser and
12 access is restricted, any subsequent request for access to such document may generate an email
13 communication to the owner of that Uber document that is (or in some cases was formerly) an Uber
14 employee who is considered a represented party. Plaintiffs do not concede that they have engaged in
15 any improper contact with represented parties, but acknowledge that they understand that rules of
16 professional responsibility prohibit contact with represented parties.

17 On March 18, 2025, Plaintiffs' Co-Lead Counsel instructed Plaintiffs' counsel not to request
18 access to internal Uber company documents, and to report any instances where access was requested.
19 Plaintiffs' Co-Lead Counsel will further instruct Plaintiffs' counsel not to access or request access to
20 internal Uber company documents or information or non-public documents or non-public information,
21 and to report to Plaintiffs' Co-Lead Counsel any instances of such access or requests for access.
22 Plaintiffs' Co-Lead Counsel will instruct Plaintiffs' counsel to provide that same instruction and
23 reporting requirement to all non-lawyer staff, experts, and anyone else working with Plaintiffs or on
24 Plaintiffs' behalf who has access to documents or information Defendants produced in this litigation.
25 Plaintiffs' Co-Lead Counsel will distribute or direct distribution of this Stipulation, in the form it is
26 entered by the Court, to all recipients of the aforementioned instructions.

27 If Plaintiffs' Co-Lead Counsel are currently aware of any access requests or actual access to
28 internal Uber company documents or information or to other non-public documents or non-public

1 information accessible via hyperlinks or URLs contained within a document Defendants have
2 produced in this litigation, other than the requests for access previously disclosed to Defendants, they
3 shall notify Defendants' counsel within 24 hours of the filing of this stipulation and provide any known
4 details regarding the request for access or actual access (e.g., date of access request or actual access,
5 document(s) containing the hyperlink(s) at issue, the hyperlink(s) at issue, email address used to
6 request access, etc.).

7 If Plaintiffs' Co-Lead Counsel become aware of anyone working with Plaintiffs or on
8 Plaintiffs' behalf who has requested access to internal Uber company documents or information or to
9 other non-public documents or non-public information accessible via hyperlinks or URLs contained
10 within a document Defendants have produced in this litigation, they shall notify Defendants' counsel
11 within two business days of receiving such notice and provide any known details regarding the request
12 for access (e.g., date of access request, document(s) containing the hyperlink(s) at issue, the
13 hyperlink(s) at issue, email address used to request access, etc.).

14 Likewise, if Defendants' counsel become aware of any Plaintiffs' counsel or staff-person who
15 has requested access to internal Uber company documents, they shall notify Plaintiffs' Co-Lead
16 Counsel within two business days of receiving such notice.

17 If Plaintiffs' Co-Lead Counsel become aware of anyone working with Plaintiffs or on
18 Plaintiffs' behalf who actually obtained access to internal Uber company documents or information or
19 to other non-public documents or non-public information accessible via hyperlinks or URLs contained
20 within a document Defendants have produced in this litigation, they shall notify Uber's counsel as
21 soon as possible, and in any event within 24 hours of receiving such notice and provide any known
22 details regarding the access (e.g., date of access, document(s) containing the hyperlink(s) at issue, the
23 hyperlink(s) at issue, email address used to request access, etc.).

24 Likewise, if Defendants' Counsel become aware of any Plaintiffs' counsel or staff-person who
25 actually obtained access to internal Uber company documents, they shall notify Plaintiffs' Co-Lead
26 Counsel as soon as possible, and in any event within 24 hours of receiving such notice.

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ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), I hereby attest that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's consent and have authorized the filing.

Dated: March 31, 2025

By: /s/ Andrew R. Kaufman